

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

| | | |
|---------------------------|---|----------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 1:19CR00166 SNLJ |
| |) | |
| JENNIFER S. NEWTON, |) | |
| |) | |
| Defendant. |) | |

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

COMES NOW Scott F. Tilsen, attorney for defendant Jennifer S. Newton, and requests leave to file defendant's Sentencing Memorandum under seal as it contains information not available to the public that is unique and private to Mrs. Newton and essential for her representation. The public interest in the information contained in the sentencing memorandum is outweighed by Mrs. Newton's rights to privacy and effective representation.

Respectfully submitted,

/s/Scott Tilsen

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Paul Hahn, Assistant United States Attorney.

/s/Scott Tilsen

Scott F. Tilsen